

BrokerCheck Report

ALLSTON TRADING LLC

CRD# 125499

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When communicating online or investing with any professional, make sure you know who you're dealing with. <u>Imposters</u> might link to sites like BrokerCheck from <u>phishing</u> or similar scam websites, or through <u>social media</u>, trying to steal your personal information or your money.

Please contact FINRA with any concerns.

About BrokerCheck®



BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

What is included in a BrokerCheck report?

- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.
- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

• Where did this information come from?

- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:
 - information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
 - o information that regulators report regarding disciplinary actions or allegations against firms or brokers.

How current is this information?

- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.
- What if I want to check the background of an investment adviser firm or investment adviser representative?
- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at https://www.adviserinfo.sec.gov. In the alternative, you may search the IAPD website directly or contact your state securities regulator at http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414.
- Are there other resources I can use to check the background of investment professionals?
- FINRA recommends that you learn as much as possible about an investment professional before
 deciding to work with them. Your state securities regulator can help you research brokers and investment adviser
 representatives doing business in your state.

Thank you for using FINRA BrokerCheck.



Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at brokercheck.finra.org



For additional information about the contents of this report, please refer to the User Guidance or www.finra.org/brokercheck. It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. For more information about FINRA, visit www.finra.org.

www.finra.org/brokercheck
User Guidance

ALLSTON TRADING LLC

CRD# 125499

SEC# 8-65807

Main Office Location

440 SOUTH LASALLE, SUITE 1200 CHICAGO, IL 60605

Mailing Address

440 SOUTH LASALLE, SUITE 1200 CHICAGO, IL 60605

Business Telephone Number

312-663-7111

Report Summary for this Firm



This report summary provides an overview of the brokerage firm. Additional information for this firm can be found in the detailed report.

Firm Profile

This firm is classified as a limited liability company. This firm was formed in Illinois on 12/31/2002. Its fiscal year ends in December.

Firm History

Information relating to the brokerage firm's history such as other business names and successions (e.g., mergers, acquisitions) can be found in the detailed report.

Firm Operations

This brokerage firm is no longer registered with FINRA or a national securities exchange.

Disclosure Events

Brokerage firms are required to disclose certain criminal matters, regulatory actions, civil judicial proceedings and financial matters in which the firm or one of its control affiliates has been involved.

Are there events disclosed about this firm?

Yes

The following types of disclosures have been reported:

Туре	Count	
Regulatory Event	5	

Registration Withdrawal Information

This section provides information relating to the date the brokerage firm ceased doing business and the firm's financial obligations to customers or other brokerage firms.



Date firm ceased business: 10/31/2014

Does this brokerage firm owe any money or securities to any customer or brokerage firm?

This firm is classified as a limited liability company.

This firm was formed in Illinois on 12/31/2002.

Its fiscal year ends in December.

Firm Names and Locations

This section provides the brokerage firm's full legal name, "Doing Business As" name, business and mailing addresses, telephone number, and any alternate name by which the firm conducts business and where such name is used.

ALLSTON TRADING LLC

Doing business as ALLSTON TRADING LLC

CRD# 125499

SEC# 8-65807

Main Office Location

440 SOUTH LASALLE, SUITE 1200 CHICAGO, IL 60605

Mailing Address

440 SOUTH LASALLE, SUITE 1200 CHICAGO, IL 60605

Business Telephone Number

312-663-7111





This section provides information relating to all direct owners and executive officers of the brokerage firm.



Direct Owners and Executive Officers

Legal Name & CRD# (if any): ALLSTON HOLDINGS LLC

Is this a domestic or foreign entity or an individual?

Domestic Entity

Position PARENT/MEMBER

Position Start Date 03/2007

Percentage of Ownership 75% or more

Does this owner direct the management or policies of the firm?

Yes

Is this a public reporting company?

No

Legal Name & CRD# (if any):

BIONDO, JAY ARTHUR

5995044

Is this a domestic or foreign entity or an individual?

Individual

CHIEF COMPLIANCE OFFICER

Position Start Date

09/2013

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of the firm?

Yes

Is this a public reporting

company?

Position

No

Legal Name & CRD# (if any):

DEVLIN, KEVIN WILLIAM

Is this a domestic or foreign entity or an individual?

Individual

Position

CHIEF FINANCIAL OFFICER/FINOP

Position Start Date

10/2013

Percentage of Ownership

Less than 5%

Direct Owners and Executive Officers (continued)

FINCA FINCA

Does this owner direct the management or policies of the firm?

Yes

Is this a public reporting company?

No

Legal Name & CRD# (if any):

JONES, CARLTON ROOSEVELT

4645926

Is this a domestic or foreign entity or an individual?

Individual

Position

PRESIDENT

Position Start Date

02/2014

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of

Yes

No

the firm?

Is this a public reporting company?

Legal Name & CRD# (if any):

LAZZO, STEPHEN KEITH

4457081

Is this a domestic or foreign entity or an individual?

Individual

Position

CHIEF TECHNOLOGY OFFICER

Position Start Date

02/2014

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of the firm?

Yes

Is this a public reporting company?

Legal Name & CRD# (if any):

No

MAHAJAN, RAJ AMIT

2782381

User Guidance

Direct Owners and Executive Officers (continued)

Is this a domestic or foreign entity or an individual?

Individual

Position

CHIEF EXECUTIVE OFFICER

Position Start Date

02/2014

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of

Yes

the firm?

Is this a public reporting

company?

No

This section provides information relating to any indirect owners of the brokerage firm.

FINCA

Indirect Owners

No information reported.

Firm History

This section provides information relating to any successions (e.g., mergers, acquisitions) involving the firm.

FINCA

No information reported.

Registrations

FINCA

This section provides information about the regulators (Securities and Exchange Commission (SEC), self-regulatory organizations (SROs), and U.S. states and territories) with which the brokerage firm is currently registered and licensed, the date the license became effective, and certain information about the firm's SEC registration.

This firm is no longer registered.

The firm's registration was from 04/03/2003 to 02/12/2015.

Types of Business

This section provides the types of business, including non-securities business, the brokerage firm is engaged in or expects to be engaged in.

This firm currently conducts 2 types of businesses.

Types of Business

Put and call broker or dealer or option writer

Trading securities for own account

Other Types of Business

This firm does effect transactions in commodities, commodity futures, or commodity options.

This firm does engage in other non-securities business.

Non-Securities Business Description: PROPRIETARY TRADING OF FUTURES, CASH CURRENCIES,

COMMODITIES AND FIXED INCOME PRODUCTS.





Clearing Arrangements

This firm does not hold or maintain funds or securities or provide clearing services for other broker-dealer(s).

Introducing Arrangements

This firm does not refer or introduce customers to other brokers and dealers.

Industry Arrangements



This firm does not have books or records maintained by a third party.

This firm does have accounts, funds, or securities maintained by a third party.

Name: NEWEDGE USA, LLC

CRD #: 36118

Business Address: 550 W JACKSON

CHICAGO, IL 60661

Effective Date: 11/01/2012

Description: NEWEDGE IS A CLEARING FIRM FOR DERIVATIVE PRODUCTS

Name: CANTOR FITZGERALD & CO.

CRD #: 134

Business Address: 110 EAST 59TH STREET

NEW YORK, NY 10022

Effective Date: 10/13/2005

Description: ACTS AS PRIME BROKER FOR CASH TREASURY TRADING

Name: ABN AMRO CLEARING CHICAGO LLC

CRD #: 14020

Business Address: 175 W.JACKSON BLVD, SUITE 400

CHICAGO, IL 60604

Effective Date: 01/30/2003

Description: FCM FOR CBOT, CME, NYSE LIFFE, ICE, AND CFE FUTURES

CONTRACTS AND EQUITIES CLEARING

This firm does not have customer accounts, funds, or securities maintained by a third party.

Control Persons/Financing

This firm does not have individuals who control its management or policies through agreement.

This firm does not have individuals who wholly or partly finance the firm's business.

Organization Affiliates

This section provides information on control relationships the firm has with other firms in the securities, investment advisory, or banking business.



This firm is, directly or indirectly:

- · in control of
- controlled by
- · or under common control with

the following partnerships, corporations, or other organizations engaged in the securities or investment advisory business.

ALLSTON HOLDINGS LLC controls the firm.

Business Address: 440 S. LASALLE ST

SUITE 1200

CHICAGO, IL 60605

Effective Date: 03/10/2007

Foreign Entity: No

Country:

Securities Activities: No No

Investment Advisory

Activities:

Description: ALLSTON HOLDINGS LLC IS THE HOLDING COMPANY AND 100% OWNER OF

ALLSTON TRADING LLC

This firm is not directly or indirectly, controlled by the following:

- bank holding company
- national bank
- · state member bank of the Federal Reserve System
- state non-member bank
- · savings bank or association
- · credit union
- · or foreign bank

Disclosure Events



All firms registered to sell securities or provide investment advice are required to disclose regulatory actions, criminal or civil judicial proceedings, and certain financial matters in which the firm or one of its control affiliates has been involved. For your convenience, below is a matrix of the number and status of disclosure events involving this brokerage firm or one of its control affiliates. Further information regarding these events can be found in the subsequent pages of this report.

	Pending	Final	On Appeal
Regulatory Event	2	3	0



Disclosure Event Details

What you should know about reported disclosure events:

- BrokerCheck provides details for any disclosure event that was reported in CRD. It also includes summary information regarding FINRA arbitration awards in cases where the brokerage firm was named as a respondent.
- 2. Certain thresholds must be met before an event is reported to CRD, for example:
 - A law enforcement agency must file formal charges before a brokerage firm is required to disclose a particular criminal event.
- 3. Disclosure events in BrokerCheck reports come from different sources:
 - Disclosure events for this brokerage firm were reported by the firm and/or regulators. When the firm and a regulator report information for the same event, both versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
- 4. There are different statuses and dispositions for disclosure events:
 - o A disclosure event may have a status of pending, on appeal, or final.
 - A "pending" event involves allegations that have not been proven or formally adjudicated.
 - An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - A "final" event has been concluded and its resolution is not subject to change.
 - o A final event generally has a disposition of adjudicated, settled or otherwise resolved.
 - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - A "settled" matter generally involves an agreement by the parties to resolve the matter.
 Please note that firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.
- 5. You may wish to contact the brokerage firm to obtain further information regarding any of the disclosure events contained in this BrokerCheck report.

Regulatory - Final

This type of disclosure event involves (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulator such as the U.S. Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of the authority of a brokerage firm or its control affiliate to act as an attorney, accountant or federal contractor.

Disclosure 1 of 3

Reporting Source: Regulator

Current Status: Final



Allegations: ALLSTON TRADING LLC ("ALLSTON"), AN EXCHANGE TPH ORGANIZATION,

WAS CENSURED AND FINED \$15,000 FOR THE FOLLOWING CONDUCT. DURING THE APPROXIMATE TIME PERIOD FROM ON OR ABOUT FEBRUARY 1, 2012 THROUGH ON OR ABOUT MAY 31, 2012, ALLSTON RESPONDED TO 12,887 COA AUCTIONS RECEIVING EXECUTION ON 6,006 CONTRACTS, WHILE NOT HOLDING AN APPOINTMENT IN THE RELEVANT OPTION CLASSES. IN ADDITION, ALLSTON RESPONDED TO 36 AIM AUCTIONS, RECEIVING EXECUTION ON 97 CONTRACTS, WHILE NOT HOLDING AN APPOINTMENT IN THE RELEVANT OPTION CLASSES. (EXCHANGE RULES

6.53C - COMPLEX ORDERS ON THE HYBRID SYSTEM AND 6.74A -

AUTOMATED IMPROVEMENT MECHANISM ("AIM"))

Civil and Administrative Penalt(ies) /Fine(s)

Initiated By: CHICAGO BOARD OPTIONS EXCHANGE

Date Initiated: 09/10/2013

Docket/Case Number: 13-0042

Principal Product Type: Options

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other Sanction(s)/Relief

Sought:

Resolution: Consent

Resolution Date: 10/16/2013

Sanctions Ordered: Censure

Monetary/Fine \$15,000.00

Other Sanctions Ordered:

Current Status:

Sanction Details: A \$15.000 FINE AND A CENSURE.

Reporting Source: Firm

Allegations: A CBOE INQUIRY ALLEGES VIOLATIONS OF EXCHANGE RULES 6.53C AND

6.74A.

Final

Initiated By: CHICAGO BOARD OPTIONS EXCHANGE

Date Initiated: 08/02/2013

Docket/Case Number: 13-0042



Principal Product Type:

Options

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief

Sought:

Resolution: Consent

Resolution Date: 10/16/2013

Sanctions Ordered: Censure

Monetary/Fine \$15,000.00

Other Sanctions Ordered:

Sanction Details: \$15,000.00 TOTAL FINE LEVIED AGAINST APPLICANT, ALLSTON TRADING

LLC. ALLSTON TRADING HAS SUBMITTED A LETTER OF CONSENT. SUCH LETTER OF CONSENT WAS SUBMITTED SOLELY FOR THE PURPOSES OF THIS PROCEEDING WITHOUT ADMITTING OR DENYING THAT OF VIOLATION

OF EXCHANGE RULES HAS BEEN COMMITTED.

Firm Statement DURING THE APPROXIMATE TIME PERIOD FROM ON OR ABOUT FEBRUARY

1, 2012 THROUGH ON OR ABOUT MAY 31, 2012, ALLSTON ALLEGEDLY RESPONDED TO AND RECEIVED EXECUTIONS IN CERTAIN OPTIONS CONTRACTS IN THE COA AND AIM AUCTIONS, WHILE NOT HOLDING AN

APPOINTMENT IN THE OPTIONS CLASSES.

Disclosure 2 of 3

Reporting Source: Regulator

Current Status: Final

Allegations: ALLSTON TRADING LLC ("ALLSTON"), AN EXCHANGE MEMBER

ORGANIZATION, ROBERT JORDAN ("JORDAN"), ITS MANAGING MEMBER, DIRECTOR AND PRESIDENT AND LAWRENCE MISH ("MISH"), ITS CHIEF FINANCIAL OFFICER AND CHIEF COMPLIANCE OFFICER, WERE EACH CENSURED. ADDITIONALLY, ALLSTON WAS FINED \$500,000 FOR THE FOLLOWING CONDUCT. ALLSTON FAILED TO ACCURATELY MARK EQUITY SALE ORDERS AS "LONG", "SHORT" OR "SHORT EXEMPT." ALLSTON

SYSTEMICALLY MARKED ALL EQUITY SALES, INCLUDING SHORT SALES, AS "LONG." ALLSTON ALSO FAILED TO PERFORM A VALID LOCATE FOR 4.7% OF EXECUTED SHORT SALE TRANSACTIONS. IN ADDITION, ALLSTON,

JORDAN AND MISH FAILED TO ENSURE THAT ADEQUATE CONTROLS WERE

IN PLACE TO PREVENT AND DETECT ERRORS IN THE MARKING OF SELL

TRANSACTIONS IN COMPLIANCE WITH EXCHANGE RULES AND



REGULATION SHO OF THE ACT (CBOE RULES 4.1 JUST AND EQUITABLE PRINCIPLE OF TRADE; 4.2 - ADHERENCE TO LAW; 15.1 MAINTENANCE, RETENTION AND FURNISHING OF BOOKS, RECORDS AND OTHER INFORMATION; SEC REGULATION SHO SHORT SALES AND RULES 200 DEFINITIONS AND MARKING REQUIREMENTS AND 203(B) LOCATE REQUIREMENTS FOR SHORT SALES THEREUNDER; OF THE SECURITIES EXCHANGE ACT OF 1934, AS AMENDED (THE "ACT"), SECTION 17(A) OF THE ACT AND RULES 17A-3 RECORDS TO BE MADE BY CERTAIN EXCHANGE MEMBERS, BROKERS AND DEALERS AND 17A-4 RECORDS TO BE PRESERVED BY CERTAIN BROKERS AND DEALERS.)

Initiated By: CHICAGO BOARD OPTIONS EXCHANGE

Date Initiated: 10/15/2007

Docket/Case Number: 07-0070

Principal Product Type: Options

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other Sanction(s)/Relief

Sought:

Resolution: Decision & Order of Offer of Settlement

Resolution Date: 11/08/2007

Sanctions Ordered: Censure

Monetary/Fine \$500,000.00

Other Sanctions Ordered:

Sanction Details: ALLSTON TRADING, LLC, ROBERT JORDAN AND LAWRENCE MISH SHALL

Civil and Administrative Penalt(ies) /Fine(s)

BE AND HEREBY ARE EACH CENSURED. IN ADDITION, ALLSTON TRADING, LLC IS FINED IN THE AMOUNT OF FIVE HUNDRED THOUSAND DOLLARS

(\$500,000)

Reporting Source: Firm

Current Status: Final

Allegations: ALLSTON FAILED TO ACCURATELY MARK NUMEROUS EQUITY SHORT SALE

ORDERS AS "LONG". "SHORT" OR "SHORT EXEMPT". ALLSTON

SYSTEMATICALLY MARKED ALL EQUITY SALES, INCLUDING SHORT SALES, AS "LONG". IN ADDITION THE FIRM ALSO FAILED TO PERFORM A VALID LOCATE FOR 4.7% OF EXECUTED SHORT SALE TRANSACTIONS. ALLSTON,



MR. JORDAN AND MR. MISH FAILED TO ENSURE THAT ADEQUATE CONTROLS WERE IN PLACE TO PREVENT AND DETECT ERRORS IN THE MARKING OF SELL TRANSACTION IN COMPLIANCE WITH REG. SHO.

Initiated By: CHICAGO BOARD OPTIONS EXCHANGE

Date Initiated: 10/15/2007

Docket/Case Number: 07-0070

Principal Product Type: Equity Listed (Common & Preferred Stock)

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief

Sought:

CENSURE

Resolution: Settled

Resolution Date: 11/08/2007

Sanctions Ordered: Censure

Monetary/Fine \$500,000.00

Other Sanctions Ordered:

Sanction Details: \$500,000 FINE LEVIED AGAINST FIRM, PAID ON NOVEMBER 20, 2007.

CENSURE AGAINST THE FIRM AND MR. JORDAN AND MR. MISH.

Disclosure 3 of 3

Reporting Source: Regulator

Current Status: Final

Allegations: ALLSTON TRADING, LLC, A MARKET-MAKER ORGANIZATION, WAS FINED

\$7,500 FOR THE FOLLOWING CONDUCT. A REVIEW OF ALLSTON'S NET

CAPITAL COMPUTATION REVEALED THAT ALLSTON IMPROPERLY

CLASSIFIED A REVERSE REPURCHASE AGREEMENT WITH ITS BANK AS AN ALLOWABLE ASSET. AS A RESULT, ALLSTON OVERSTATED ITS NET CAPITAL BY APPROXIMATELY 80%. (CBOE RULES 4.2 - ADHERENCE TO LAW; 15.1 MAINTENANCE, RETENTION AND FURNISHING OF BOOKS,

RECORDS AND OTHER INFORMATION; SECTION 15(C) OF THE SECURITIES EXCHANGE ACT OF 1934, AS AMENDED (THE "ACT") AND RULE 15C3-1 - NET CAPITAL THEREUNDER, SECTION 17(A) OF THE ACT AND RULES 17A-3 RECORDS TO BE MADE BY CERTAIN EXCHANGE MEMBERS, BROKERS AND DEALERS AND 17A-5 - REPORTS TO BE MADE BY CERTAIN BROKERS AND

DEALERS.)



Initiated By: CHICAGO BOARD OPTIONS EXCHANGE

Date Initiated: 04/30/2007

Docket/Case Number: 07-0038

Principal Product Type: Options

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief

Sought:

Resolution: Decision & Order of Offer of Settlement

Resolution Date: 06/20/2007

Sanctions Ordered: Monetary/Fine \$7,500.00

Other Sanctions Ordered: ALLSTON TRADING, LLC. SHALL BE AND HEREBY IS FINED IN THE AMOUNT

OF SEVEN THOUSAND FIVE HUNDRED DOLLARS (\$7,500).

Sanction Details: ALLSTON TRADING, LLC. SHALL BE AND HEREBY IS FINED IN THE AMOUNT

OF SEVEN THOUSAND FIVE HUNDRED DOLLARS (\$7,500).

(ψ.,,...)

Reporting Source: Firm

Current Status: Final

Allegations: DURING A ROUTINE EXAMINATION THE CBOE RECLASSIFIED A REVERSE

REPURCHASE SWEEP ACCOUNT HELD BY ALLSTON AS A NON-ALLOWABLE

ASSET RESULTING IN AN OVERSTATEMENT OF NET CAPITAL BY

APPROXIMATELY 80%.

Initiated By: CHICAGO BOARD OPTIONS EXCHANGE

Date Initiated: 04/30/2007

Docket/Case Number: 07-0038

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief

Sought:



Resolution: Settled

Resolution Date: 06/20/2007

Sanctions Ordered: Monetary/Fine \$7,500.00

Other Sanctions Ordered:

Sanction Details: SETTLEMENT RESULTED IN \$7500 FINE FOR THE FIRM.



Regulatory - Pending

This type of disclosure event may include a pending formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulatory agency such as the Securities and Exchange Commission, foreign financial regulatory body) for alleged violations of investment-related rules or regulations.

Disclosure 1 of 2

Reporting Source: Firm

Current Status: Pending

Allegations: THE CME IS REVIEWING THE FIRM'S MESSAGING ACTIVITY ON OCTOBER

23, 2012.

Initiated By: CHICAGO MERCANTILE EXCHANGE

Date Initiated: 10/23/2012

Docket/Case Number: 12-8813

Principal Product Type: Futures - Financial

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other Sanction(s)/Relief

Sought:

Firm Statement THE FIRM IS CURRENTLY WAITING FOR ADDITIONAL INFORMATION

REGARDING THIS INVESTIGATION FROM THE CME.

Disclosure 2 of 2

Reporting Source: Firm

Current Status: Pending

Allegations: THE CME IS REVIEWING INCIDENTS OF SELF-TRADING.

Initiated By: CHICAGO MERCANTILE EXCHANGE

Date Initiated: 05/01/2013

Docket/Case Number: 12-9023

Principal Product Type: Futures - Financial

Other Product Type(s): Principal Sanction(s)/Relief

Principal Sanction(s)/Relie

Sought:



Other Sanction(s)/Relief Sought:

Firm Statement

THE FIRM IS CURRENTLY WAITING FOR ADDITIONAL INFORMATION REGARDING THIS INVESTIGATION FROM THE CME.

www.finra.org/brokercheck

End of Report



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